

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER FREEMAN,

Plaintiff,

v.

STAKE.COM, PRIMEDICE, EDWARD CRAVEN,  
BIJAN TEHRANI, SLICEMEDIA B.V., MEDIUM  
RARE N.V., EASYGO SOLUTIONS PTY LTD,  
MEBIT.IO, AND MLADEN VUČKOVIĆ,

Defendants.

Case No. 22-CV-7002 (RA)

**DEFENDANTS' NOTICE OF MOTION TO DISMISS COMPLAINT**

PLEASE TAKE NOTICE that, upon this Notice of Motion to Dismiss, the accompanying Memorandum of Law and exhibit thereto, the Declaration of David H. McGill and exhibits thereto, and the Declarations of Bijan Tehrani, Edward Craven, and Mladen Vučković, the Defendants will move this Court, before the Honorable Ronnie Abrams, United States District Judge, Southern District of New York, at 40 Foley Square, New York, New York 10007, on a date and a time designated by the Court, for an Order, pursuant to Rule 12 of the Federal Rules of Civil Procedure to dismiss the Amended Complaint in its entirety and with prejudice, on the grounds that the Court lacks jurisdiction over the Complaint and the claims are time-barred, impermissibly grouped, duplicative, and inadequately pleaded. Oral argument is requested on a date and at a time designated by the Court.

Dated: February 9, 2023

Respectfully submitted,

Orrick, Herrington & Sutcliffe LLP

By: /s/ David McGill

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